

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

CERTIFICATION OF JESSICA DAVIDSON

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC. I make this Certification based on personal knowledge and in support of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; Solco Healthcare U.S., LLC; Teva Pharmaceuticals USA, Inc.; Teva Pharmaceutical Industries Ltd.; Actavis LLC; Actavis Pharma, Inc.; Torrent Pharmaceuticals Ltd.; and Torrent Pharma, Inc. (collectively, the “TPP Trial Defendants”)’s Motion for Decertification of the TPP Trial Subclasses.

2. Attached hereto as Exhibit 1 is a true and correct copy of Ben Wieder & Jay Weaver, *“Red Flags On Top Of Red Flags”: Problems Mount For UM Athletics Booster John Ruiz*, Miami Herald, July 30, 2023.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Supplemental Damages Expert Declaration of Rena Conti, Ph.D., dated December 1, 2023, served in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

4. Attached hereto as Exhibit 3 is a true and correct copy of Pharmacy Supplemental Analysis, attached to a December 18, 2023 email from John Davis to Defendants. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

5. Attached hereto as Exhibit 4 is a true and correct copy of the February 1, 2024 transcript of the deposition of Rena Conti, taken in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

6. Attached hereto as Exhibit 5 is a true and correct copy of the January 11, 2022 Memorandum of Law in Support of Defendants’ Motion to Exclude Testimony of Dr. Rena Conti filed in *In re Novartis & Par Antitrust Litigation*, No. 1:18-cv-04361-AKH, ECF 489 (S.D.N.Y.).

7. Attached hereto as Exhibit 6 is a true and correct copy of the February 12, 2024 Order filed in *MSPA Claims 1, LLC v. Liberty Mutual Fire Insurance Co.*, No. 17-22539, ECF 242 (S.D. Fla.).

8. Attached hereto as Exhibit 7 is a true and correct copy of an April 28, 2023 Agreed Court Order Resolving Plaintiffs' Motions to Strike in *Velez v. Florida Power & Light Co.*, No. 2017-022854-CA-01 (Fla. Cir. Ct.).

9. Attached hereto as Exhibit 8 is a true and correct copy of MSP Recovery, Inc., Annual Report (Form 10-K) (July 27, 2023).

10. Attached hereto as Exhibit 9 is a true and correct copy of MSP Recovery, Inc., Quarterly Report (Form 10-Q) (Nov. 14, 2023).

11. Attached hereto as Exhibit 10 is a true and correct copy of the August 10, 2023 complaint in *Cano Health, LLC v. MSP Recovery, Inc.*, No. 2023-021166-CA-01 (Fla. Cir. Ct.).

12. Attached hereto as Exhibit 11 is a true and correct copy of MSP Recovery, Inc., Current Report (Form 8-K) (Aug. 1, 2023).

13. Attached hereto as Exhibit 12 is a true and correct copy of the SummaCare Assignment filed in *MSP Recovery Claims Series, LLC v. Liberty Mutual Insurance Co.*, No. 1:22-cv-10928-RWZ, ECF 1-7 (D. Mass. June 14, 2022).

14. Attached hereto as Exhibit 13 is a true and correct copy of the Emblem Assignment filed in *MSP Recovery Claims, Series LLC v. Liberty Mutual Insurance Co.*, No. 1:22-cv-10809-RWZ, ECF 1-9 (D. Mass. May 25, 2022).

15. Attached hereto as Exhibit 14 is a true and correct copy of the February 7, 2024 transcript of the deposition of Andrew Colby, taken in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

Dated: February 13, 2024

Respectfully submitted,

By: /s/ Jessica Davidson
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 13, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson